

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : BANKRUPTCY NO. 18-11822(JKF)  
KAREN GUSHUE : CHAPTER 13  
Debtor :  
: HEARING SCHEDULED FOR  
: NOVEMBER 14, 2018 AT 9:30 A.M.  
: UNITED STATES BANKRUPTCY COURT  
: 900 MARKET STREET  
: PHILADELPHIA, PENNSYLVANIA 19107

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Ally Bank has filed a Motion for Relief from the Automatic Stay and Co-Debtor Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) and 11 U.S.C. §1301(c) and Waiver of 14 Day Stay of Effectiveness of Order with the Court to terminate the automatic stay as to Ally Bank with respect to a 2014 Dodge Grand Caravan, VIN: 2C4RDGCGXER250601 (the “Vehicle”); permit Ally Bank to take such actions and seek such remedies to recover the Vehicle as are permitted by the Retail Installment Sale Contract, the Pennsylvania Uniform Commercial Code and other applicable laws; and grant such other and further relief as this Court may deem just and proper.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **November 2, 2018**, you or your attorney must do all of the following:

- (a) file an answer explaining your position at:

900 Market Street, Philadelphia, Pennsylvania 19107

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant’s attorney:

Regina Cohen, Esquire  
LAVIN, O’NEIL, CEDRONE & DiSIPIO  
190 North Independence Mall West  
Suite 500  
6<sup>th</sup> and Race Streets  
Philadelphia, PA 19106

Phone No. (215) 627-0303

Fax No. (215) 351-1900

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Jean K. FitzSimon on November 14, 2018 at 9:30 a.m. in Courtroom 3, United States Bankruptcy Court, 900 Market Street, Philadelphia, Pennsylvania 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: October 18, 2018